

**Document Title: Privacy Policy**

Section: 5 Policies and Processes

Document ref: 5.02

Issued date: 31/01/20

Version: 1.0

The following documents contains the organisation's Privacy Policy.

We understand that there might be different collecting points for obtaining personal data and different lawful basis for processing it, therefore, the following privacy policy shall be disclosed, used, and adapted throughout the organisation, this includes marketing communications and website.

**Privacy Policy:**

Arlington Residential is committed to ensuring the privacy and security of your personal information. Because of that, this policy sets out where and how we collect your personal information, as well as your rights over any personal information we hold about you, and how to make a complaint. This Privacy Policy was updated on 9<sup>th</sup> January 2020 in compliance with the Data Protection Act 2018 and the General Data Protection Regulation.

**How we may collect your personal data**

We obtain personal data about you, for example, when:

- you request a proposal from us in respect of the services we provide;
- you engage with us to provide our services and during the provision of those services;
- you contact us by email, telephone or post (for example when you have a query about our services); or
- subscribing to our newsletter on the website;
- you apply for a job.

**Making an enquiry through the form on the website, email or phone.**

If you use our website enquiry form, email or phone number to make a question about our services you can be sure we will only use it to process and answer your enquiry. We will collect your full name, company name, email, and phone number. In order to provide an efficient service and for our legitimate interest will save this information in our database for a period of four months, after which it will be deleted or destroyed.

**How we use personal data we hold about you**

We may process your personal data for purposes necessary for the performance of our contract with you and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.



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We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Where we need to manage your account and protect you against or identify possible fraudulent transactions, we will do so in accordance with our legal obligation placed on us under law. We will seek consent from you if we need to process your data solely identified purposes. To ensure meaningful consent is obtained from you, Arlington Residential will provide you with reasonable notice ensuring that your consent is provided on an informed basis.

We do not sell your personal information to marketers outside of Arlington Residential. We share your personal information within Arlington Residential and as described in this statement.

**We may transfer or otherwise process your personal information:**

As part of the sale of Arlington Residential to another company.

When we have received your instruction to pass the sale of your property to another agent. To protect, defend or exercise the rights and property of Arlington Residential (including enforcing our Terms and Conditions).

When required by law and/or government authorities.

We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

**Change of purpose**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

**Your rights**

If you would like to exercise any of these rights, please contact [Marc@arlingtonresidential.com](mailto:Marc@arlingtonresidential.com)

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where Arlington Residential is relying on its legitimate interests as the legal ground for processing.

## **Right to access and rectification**

You have the right to access the personal information that we hold about you in many circumstances. This is called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge.

Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

## **Right to erasure**

You have the right to request us to delete or remove your personal data where there is no compelling reason for its continued processing, although, this can only be done under specific circumstances.

## **Right to restrict the processing**

You have the right to restrict the data processing, however, this can only be done under specific circumstances.

If you would like to exercise any of these rights, please contact [Marc@arlingtonresidential.com](mailto:Marc@arlingtonresidential.com)

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

## **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you



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would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. You can do this by using the opt out link on our email or you can contact [Marc@arlingtonresidential.com](mailto:Marc@arlingtonresidential.com) or write to us at the address below.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Arlington Residential is committed to keeping personal information secure. We have implemented technical, administrative and physical procedures designed to protect personal information from loss, misuse or alteration. We limit access to personal information to those who have a business need. We keep personal information only for so long as deemed reasonably necessary.

### Changes to this notice

We will post changes to this Privacy Policy and indicate the effective date when this Privacy Statement is updated. If we make any material changes to this Privacy Statement, we will notify you by sending an e-mail to the e-mail address you most recently provided us or by posting notice of the changes on this site.

This privacy notice was last updated on 19<sup>th</sup> March 2020.

### COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy

<https://arlingtonresidential.com/cookie-policy/>.

### Contact Us

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our Data Privacy Lead – [info@arlingtonresidential.com](mailto:info@arlingtonresidential.com) or write to us at the address below:

Arlington Residential  
8 Wellington Road,  
St. John's Wood,  
London.  
NW8 9SP

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:



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Information Commissioner's Office

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